

Exhibit 22

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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BRIAN DONNELLY AKA KAWS and
KAWS INC.,

Plaintiff,

-against-

Case No.: 1:21-cv 9562 (PKC)

**DEFENDANTS' AFFIDAVIT IN
RESPONSE TO PLAINTIFF'S
DISCOVERY DEMANDS**

JONATHAN ANAND, both individually and doing
business as HOMELESS PENTHOUSE,
PENTHOUSE THEORY, HIDEOUT.NYC,
INCOGNITO and YOUNG NEON, DAVID
KANG, DYLAN JOVAN LEONG YI ZHI, THE
PENTHOUSE THEORY, THE PENTHOUSE
COLLECTIVE and OSELL DINODIRECT CHINA
LIMITED,

Defendants.
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I, Jonathan M. Anand, defendant in this matter submit this Affidavit pursuant to
28 U.S.C. §1746(1) in compliance with Order dated July 21, 2023, in the captioned case:

1. I am fully familiar with the facts and circumstances hereinafter set forth.
2. I further state that I am making this Affidavit pursuant to 28 U.S.C. §1746(1) for the reason
I am out of United States and my current address is Flat 4 D, 14-18 Staunton Street, Soho,
Central, Hong Kong.
3. I further state that in compliance with the Order dated July 21, 2023, I have provided more
specific responses to interrogatories Number 13-21 of the Plaintiff.

4. I further state that the manufacturing and day to day operations of the Defendant businesses were based out of China.
5. I further state that I only offered marketing services for some of the Defendant businesses, and I do not own any interest or ownership in any of the entities named in this matter. I was not a part of the day-to-day operations of the Defendant businesses in this matter. I did not manage or supervise these businesses. I did not have any authority, control or possession of the documents requested by Plaintiff.
6. I further state that I was residing in China prior to pandemic and thereafter I came to United States and lived with my parents in Virginia.
7. I further state that after the pandemic was over, I moved to Thailand to find any job opportunities. Not finding anything suitable currently, I have moved to Hong Kong and looking for employment.
8. I further state that I have no contact with anyone in China ever since my departure from the country during the pandemic.
9. I further state that I have made reasonable enquiries and efforts to find concerned people in China but to no avail. Therefore, as stated above, I have no possession of any documents requested by the Plaintiff in its document discovery.
10. I further state that I have substantially complied with Plaintiffs' demands and requests and have provided all answers and responses to the best of my ability and availability.

11. I further state that I had provided Defendants' Supplementary responses (No. 13-21) to Plaintiff's First Set of Interrogatories, to the Plaintiff's attorney, to the best of my knowledge, availability, and information possessed by me.

Date: August 14, 2023.



Jonathan M. Anand

VERIFICATION

"I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on August 14, 2023.



Name: JONATHAN ANAND